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IN THE  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

DeAnn G. Graham

Plaintiffs

CAUSE NO. 3:23cv 7

VS.

CIM Living  
Defendant

**NATURE OF ACTION**

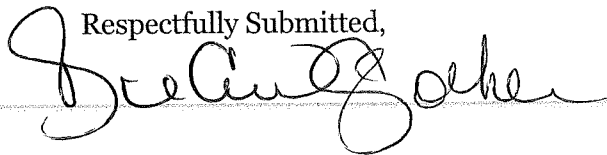
This action is brought by DeAnn G. Graham, to pursuant **Fair Housing Act of 1968, as amended by the Fair Housing Amendments Act of 1988**, The 1968 Act expanded on previous acts and prohibited discrimination concerning the rental, and financing of housing based on race, religion, national origin, sex, (and as amended) handicap and family status. The housing discrimination and retaliation to families with children, that have Special requirements or conditions are protected. The amended Fair Housing Act prohibits, a housing Provider from refusing to rent or sell to families with children, that need a reasonable accommodation. Federal Fair Housing Act, Prohibits and makes it is illegal, for a landlord to raise rent based on the age, race, religion, nation or origin, familial status, or disability status of a tenant, and or any retaliation. The Fair Housing Act also Prohibits interfere with fair housing rights, prohibits discrimination on the basis of disability in all types of housing transactions. The Act defines persons with a disability to mean those individuals with mental or physical impairments that substantially limit one or more major life activities.

- I. Ms. Melissa Chavez the property manager for (previous property management Jill Herron 10/31/2022) who is still in a ongoing lawsuit. Ms. Melissa Chavez now the property manager for CIM living properties, as of 10/31/2022.
- II. The same blatant retaliation and discrimination, of Fair housing discrimination, that I have been subjected to throughout Northern Indiana. CIM Living has decided to engage and willfully participate.
- III. Ms. Melisa Chavez has concealment of documents, suppressed material fact of

- IV. Discriminatory and retaliatory action by altering a standing Fair housing agreement put in place by (previous property management Jill Herron) and (DeAnn Graham). Ms. Melisa Chavez was fully aware of.
- V. CIM Living has, all agreements from (previous property management Jill Herron). CIM Living has been here less than two months. as picked up where (previous property management Jill Herron) and Ms. Melisa Chavez, left off with Fair Housing Discrimination. CIM Living altered agreement with no mutual consent by \$500 more than what I'm paying now, to try to force me to just leave. This is blatant retaliation and discrimination, of Fair housing discrimination. I **allege** this is just more discrimination because of ESA.

Racial bias, against me and my family status. Intentional infliction of emotional distress, Trauma emotional distress and mental anguish. There was absolutely falsifying documents and misrepresenting factual information, spoliation of evidence. The Fair Housing Act (FHA) is a federal law that prevents discrimination against tenants in their home, "reasonable accommodation" to allow pets who serve as assistance animals, which includes animals who provide emotional support. The retaliatory actions to raise the rent. The ongoing emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, injury to professional standing, injury to character, reputation, loss of health and any other non-pecuniary losses that are incurred as a result of the discriminatory conduct. Emotional distress including sleeplessness, anxiety, stress, depression, humiliation, emotional distress, loss of self-esteem, excessive fatigue, a nervous breakdown.

Respectfully Submitted,



**DeAnn G. Graham**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via US Mail this 2nd day of January 2023 .

**CERTIFICATE OF SERVICE**

CIM Living  
2002 Raintree Dr.  
Elkhart, In. 46514  
Defendant

Respectfully submitted this 2nd day of January 2023



**DeAnn G. Graham**

DeAnn Graham  
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Plaintiffs-Appellants